



Brown International Corporation

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

Reference: Docket Number 02D-0333

Guidance for Industry

Juice HACCP Hazards and Controls Guidance First Edition

**U.S. Department of Health and Human Services
Food and Drug Administration
Center for Food Safety and Applied Nutrition
September 2002**

To whom it may concern,

In reference to the above document, Brown International Corporation objects to the insertion of the term “pinpoint extraction” and request that all references to pinpoint extraction (V.C.1.0, V.C.1.3, V.C.5.34, V.F. Table 1., and VII.A.3.0) be removed.

The use of the term “pinpoint extraction” implies, without scientific basis, an endorsement, or at very least a preference, for only one type of juice extraction principle and implies that juice is extracted through a pin-sized hole. We are sure this is not the intent of the regulation. Pinpoint extraction more appropriately describes a method used by the industry for removal of oil from the skin of citrus fruit prior to juice extraction.

We also take issue with the statement, in V.C.5.34, that “pinpoint extraction can accomplish this (avoids any potential contamination of juice by pathogens) by ensuring that virtually no contact of the juice with the peel occurs during the extraction step.” If this were the case then there would be virtually no peel oil found in the juice.

The industry regards peel oil in raw juice as a primary indicator of peel contact or exposure and routinely monitors the oil content as a quality indicator when producing both pasteurized and non-pasteurized juices. Low peel oil contents are attained with Brown juice extractors by using the “reaming” principle which allows the peel to remain mostly intact during extraction.

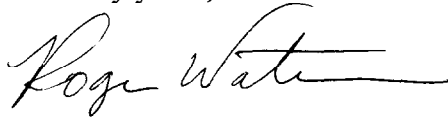
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Both extraction principles are regarded by the industry as being able to produce high quality juices when operated under prescribed conditions. We estimate that over 300 million gallons of high quality NFC juices are produced annually in the United States alone from juice extracted with Brown International Corporation extractors using the "reaming" principle.

In summary we see no basis for the insertions of pinpoint extraction in this document and request that all such references be removed. In our opinion, and as expressed by others in the industry, it new extraction technologies should not be excluded and it should be left up to the processor on what technology, new or old, should be used to achieve a 5-log reduction.

Sincerely yours,

A handwritten signature in cursive script that reads "Roger Waters". The signature is fluid and extends to the right with a long horizontal stroke.

Roger Waters
V.P. Technical Services
Brown International Corporation